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21 **UNITED STATES DISTRICT COURT**
22
NORTHERN DISTRICT OF CALIFORNIA
23
SAN FRANCISCO DIVISION

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1 **IN RE GOOGLE PLAY STORE
2 ANTITRUST LITIGATION**

3 THIS DOCUMENT RELATES TO:

4 *In re Google Play Consumer Antitrust
5 Litigation*, Case No. 3:20-cv-05761-JD

6 Case No. 3:21-md-02981-JD

7 **DECLARATION OF SUJAL J. SHAH IN
8 SUPPORT OF DEFENDANTS'
9 OPPOSITION TO PLAINTIFFS' CLASS
10 CERTIFICATION MOTION**

11 Judge: Hon. James Donato

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1 **TO PLAINTIFFS AND THEIR ATTORNEYS OF RECORD:**

2 I, Sujal J. Shah, declare as follows:

3 1. I am an attorney admitted to practice law in California and before this Court. I
4 am a partner at Morgan, Lewis & Bockius LLP, counsel of record for Defendants Google LLC,
5 Google Ireland Limited, Google Commerce Ltd., Google Payment Corp., Google Asia Pacific
6 Pte. Ltd., and Alphabet Inc. (“Defendants” or “Google”) in the above-captioned matter. I submit
7 this declaration in support of Google’s Opposition to Plaintiffs’ Class Certification Motion. I have
8 personal knowledge of the statements in this declaration, and if called and sworn as a witness, I could
9 and would testify competently thereto.

10 2. Attached hereto as **Exhibit A** is a true and correct copy of the expert report of Dr.
11 Michelle M. Burtis, Ph.D., served on Plaintiffs on March 31, 2022.

12 3. Attached hereto as **Exhibit B** is a true and correct copy of excerpts from the
13 transcript of the deposition of Lacey Ellis, taken in this matter on March 22, 2022.

14 4. Attached hereto as **Exhibit C** is a true and correct copy of excerpts from the
15 transcript of the deposition of Daniel Scalise, taken in this matter on March 11, 2022.

16 5. Attached hereto as **Exhibit D** is a true and correct copy of excerpts from the
17 transcript of the deposition of Richard Czeslawski, taken in this matter on March 21, 2022.

18 6. Attached hereto as **Exhibit E** is a true and correct copy of Avi Goldfarb & Catherine
19 Tucker, *Digital Economics*, 57 J. Econ. Lit. 3, 12 (2019).

20 7. Attached hereto as **Exhibit F** is a true and correct copy of excerpts from the
21 transcript of the deposition of Michelle M. Burtis, Ph.D. taken in this matter on May 16, 2022
22 and May 17, 2022.

23 8. Attached hereto as **Exhibit G** is a true and correct copy of excerpts from the
24 transcript of the deposition of Hal Singer, Ph.D. taken in this matter on May 12, 2022.

25 9. Attached hereto as **Exhibit H** is a true and correct copy of the Class Certification
26 Report of Hal J. Singer, Ph.D., dated February 28, 2022.

10. Attached hereto as **Exhibit I** is a true and correct copy of the Class Certification Reply Report of Hal J. Singer, Ph.D., dated April 26, 2022.

11. Attached here to as **Exhibit J** is a true and correct copy of excerpts from the transcript of the deposition of Paul Feng, taken in this matter on January 14, 2022, and January 18, 2022.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on this 23rd day of June, 2022 in San Francisco, California.

Sigil I. J. M.

Sujal J. Shah